

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA            )  
  )  
  )           CRIMINAL NO. 21-CR-642(JDB)  
  )  
v.    )  
  )  
DARRELL NEELY                            )

UNOPPOSED MOTION FOR EXTENSION TO FILE PROPOSED VOIR DIRE,  
JURY INSTRUCTIONS AND EXHIBIT LIST

NOW COMES the defendant, Darrell Neely, by and through counsel, Kira Anne West and moves this Honorable Court to grant defendant’s unopposed motion for extension of time to file voir dire, jury instructions and exhibit list and states the following in support:

1. Undersigned counsel and attorney Nicole Cabbage are currently in trial before the Honorable Royce C. Lamberth in a felony J6 case styled *USA v. Kelly*, 21-CR-708. We expect the trial to end Monday, May 8, 2023.
2. Undersigned counsel has conferred with the AUSA’s and given objections to stipulations. Undersigned counsel believes the jury instructions and voir dire will be similar to that used in the case before Judge Lamberth and other trials this Court has conducted.
3. While undersigned counsel has been in trial, she received yet additional discovery to add to her exhibit list at 3:30 this afternoon. There have also

